

REMARKS

The specification has been amended to correct a number of minor typographical errors.

Claims 17 and 18 have been amended to address indefiniteness issues noted by the Examiner. Thus, all of Claims 12 through 24 are believed to be allowable.

New independent Claim 29 defines the invention as an apparatus for performing a hydroforming operation that includes a base platen that is adapted to support a first section of a first die thereon and a ram platen that is adapted to support a first section of a second die thereon. The ram platen is movable relative to the base platen between a closed position and an opened position. An intermediate platen is located between the base platen and the ram platen and is adapted to support a second section of the first die and a second section of the second die thereon. The intermediate platen is movable relative to the base platen between a closed position and an opened position. The intermediate platen is also movable relative to the ram platen between a closed position and an opened position. Lastly, a structure extends between the intermediate platen and one of the base platen and the ram platen to move the intermediate platen to the opened positions relative to the base platen and the ram platen when the ram platen is moved to the opened position.

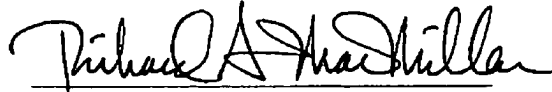
The Marando reference discloses a hydroforming apparatus that includes a support mechanism 31 for positioning first and second dies 14 and 16 in opened positions. Regarding this support mechanism 31, the Marando reference merely states that:

“The combined assembly of the second die section 20 of the first die 14 and the first section 22 of the second die 16 is preferably supported on a support mechanism 31 the hydroforming apparatus 10 for movement therewith. Alternatively, if the second die section 20 of the first die 14 and the first die section 22 of the second die 16 are formed as separate pieces, then each may be supported on individual support mechanisms (not shown).”

The Marando reference does not disclose any specific structure for the support mechanism 31, much less a structure that extends between the intermediate platen and one of the base platen and the ram platen to move the intermediate platen to the

opened positions relative to the base platen and the ram platen when the ram platen is moved to the opened position, as specifically claimed. Thus, the invention set forth in Claim 29 is neither shown nor suggested in the Marando reference.

Respectfully submitted,



Richard S. MacMillan

Reg. No. 30,085

MacMillan, Sobanski & Todd, LLC
One Maritime Plaza, Fourth Floor
720 Water Street
Toledo, Ohio 43604
(419) 255-5900